

Hecker Fink LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.HECKERFINK.COM

DIRECT DIAL 212.763.0883

DIRECT EMAIL jdabbs@heckerfink.com

November 20, 2024

BY ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Robert Nunez, et al., 21 Cr. 246 (RA)

Dear Judge Abrams:

We write on behalf of our client Robert Nunez to request a modest adjournment of the sentencing currently scheduled to take place tomorrow, to on or after December 9, 2024, following Mr. Nunez's next appearance in his state case, which is currently scheduled for December 4, 2024. We apologize for the late nature of this request, but it follows from events that took place in state court this afternoon. This is our first request for an adjournment of sentencing in this case. The government takes no position on this request.

After consultation with Mr. Nunez's state counsel, we understand that there was a bail hearing held in Mr. Nunez's state case this afternoon. State counsel reports that Judge Statsinger, who is presiding over Mr. Nunez's state case, reserved decision on the application until Mr. Nunez's next appearance on December 4, 2024. It is our understanding that today's bail application followed a series of discussions between Mr. Nunez's state counsel and the Assistant District Attorney responsible for his state case. If Judge Statsinger grants bail, federal authorities would assume primary custody over Mr. Nunez, which would allow him to serve his forthcoming federal sentence in federal custody. This would permit Mr. Nunez the opportunity to participate in federal programming, including but not limited to drug treatment programs available in the federal system. Accordingly, we respectfully ask that Mr. Nunez's sentencing be adjourned to a date on or after December 9, 2024, in order to allow for the pending primary custody determination to be resolved.

Application granted. The sentencing scheduled to take place on November 21, 2024 is hereby adjourned to December 10, 2024 at 12:00 p.m.

SO ORDERED.

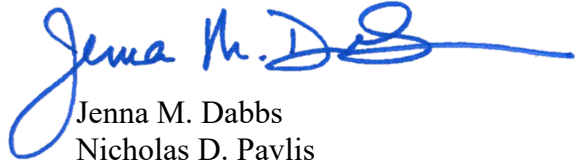


Hon. Ronnie Abrams
November 20, 2024

Hecker Fink LLP

2

Respectfully submitted,



Jenna M. Dabbs
Nicholas D. Pavlis
HECKER FINK LLP
350 Fifth Avenue, 63rd Floor
Telephone: (212) 763-0883
jdabbs@heckerfink.com
npavlis@heckerfink.com

cc: (by ECF)
AUSA Danielle M. Kudla
AUSA Alexander Nuo Li